



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604**

DATE: AUG 30 2017

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Sims Metal Management, Hartford, Connecticut

FROM: Scott Connolly, Environmental Engineer
AECAB (IL/IN)

THRU: Nathan Frank, Section Chief
AECAB (IL/IN)

TO: File

BASIC INFORMATION

Facility Name: Sims Metal Management

Facility Location: 263 Locust Street, Hartford, CT

Date of Inspection: July 27, 2017

EPA Inspectors:

1. Scott Connolly, Environmental Engineer, US EPA
2. Steve Rapp, Chief, Air Technical Unit, US EPA

Other Attendees

1. Scott Jacobs, Regional SHEC Manager, Sims Metal Management

Purpose of Inspection: To determine compliance with the Clean Air Act

Facility Type: Metal Recycling Facility

Regulations Central to Inspection: 40 C.F.R. Part 82, Subpart F: Recycling and Emissions Reductions

Arrival Time: 11:00 am EST

Departure Time: 11:35 pm EST

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Credentials Presented
- ☒ CBI warning to facility provided

The following information was obtained verbally from Scott Jacobs unless otherwise noted.

Process Description:

Sims Metal Management (Sims) in Hartford is a scrapyard that accepts various post-consumer and industrial ferrous and non-ferrous metals. The facility collects white good, appliances, and other metals at the Hartford facility to serve as a transfer station for the Sims shredder in North Haven, Connecticut. The facility has small ferrous and non-ferrous metal sorting areas.

Staff Interview: Facility staff stated that they do not accept vehicles. Sims maintains contracts with all metal suppliers that deliver metal to the facility. The supplier contract states that all refrigerants have been removed from appliances prior to arrival at the facility. Sims also has a verification statement on every scale ticket, but do not require it to be signed if a Scrap Acceptance Agreement has been signed in the past two years.

TOUR INFORMATION

EPA toured the facility: Yes

Data Collected and Observations:

Air conditioning units and appliances were observed in the scrap metal piles, but it is unknown if they had been properly drained or evacuated. Scrap inspectors were observing the unloading of scrap metal, but Mr. Jacobs stated that they do not specifically check for refrigerants in appliances because Sims relied on the signed verification statement.

Field Measurements: were not taken during this inspection.

Photos and/or Videos: were taken during the inspection.

Photo Log is contained in Appendix A of this Inspection Report

RECORDS REVIEW

1. Scale Ticket (obtained one copy)
 - a. Form contains CFC Verification statement
 - b. Customer certifies that refrigerants have been removed, but Presumes that Buyer's Scrap Acceptance Agreement has been signed in past two years if blank
2. Supplier Agreement (obtained one copy)

CLOSING CONFERENCE

Concerns: The facility requires every customer sign a contract stating that they have removed refrigerants from all items, and has a verification statement for each load, but if verification is blank, it refers to contracts.

SIGNATURES

Lead Inspector: Sett Curoy Date: 9/18/17

Section Chief: [Signature] Date: 8/30/17

Facility Name: Sims Metal Management
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APPENDICES AND ATTACHMENTS

1. Appendix A: Digital Image Log
2. Appendix B: Field Notes

Facility Name: Sims Metal Management
Facility Location: 263 Locust St. Hartford, CT
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APPENDIX A: DIGITAL IMAGE LOG

1. Photographer Name: Steve Rapp	2. Archival Record Location: https://usepa-my.sharepoint.com/personal/connolly_scott_epa_gov/_layouts/15/guestaccess.aspx?guestaccesstoken=J%2b7vdXEgPZs8745Ouc4hZSUPisZY0d2yrBxc1st3uB8%3d&folderid=2_07888ae04f22942ffb23d959a94ad1be0&ev=1
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Image Number	File Name	Date and Time (incl. Time zone and DST)	Latitude and Longitude	Description of Image
1	IMG_0725	July 2, 2017 at 9:58	Data not available	Prohibited Materials sign at the entrance to the weigh scale.

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APPENDIX B: FIELD NOTES

See attached for Field Notes from EPA inspectors Scott Connolly and Steve Rapp and for obtained documents